

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 1:18-cr-83 (TSE)

**MOTION TO EXTEND DATE OF GOVERNMENT’S NOTICE OF INTENT TO RETRY
OR DISMISS REMAINING COUNTS OF SUPERSEDING INDICTMENT**

The United States of America, by and through Special Counsel Robert S. Mueller, III, hereby files this motion to extend the date by which the government must notify the Court whether it intends to retry or dismiss any or all of Counts 11, 13, 14, 24, 26, 28, 29, 30, 31, and 32 of the Superseding Indictment. On August 21, 2018, a jury found the defendant guilty of eight counts of the Superseding Indictment, and was unable to reach a unanimous verdict on ten counts – Counts 11, 13, 14, 24, 26, 28, 29, 30, 31, and 32. *See* Doc. 280. Immediately following receipt of the jury’s verdict in this case, counsel for the defendant orally moved the Court to extend for thirty days the deadline for filing post-trial motions on the eight guilty counts. The government did not oppose the defendant’s motion for additional time. *See* Doc. 273.

On August 22, 2018, the Court ordered the government to file notice by August 29, 2018, on whether the government intends to retry or dismiss any or all of the remaining ten counts on which the jury did not reach a unanimous verdict. *See* Doc. 264. Because the defendant’s post-trial motions have not been filed or ruled on, the government does not at this time have sufficient information to make an informed decision on whether it will seek retrial of the remaining counts. The government, accordingly, respectfully requests that the Court extend the deadline for the

government to file notice about the ten remaining counts to one week after the Court has ruled on defendant's post-trial motions.

The United States has consulted with counsel for the defendant and they do not object to the government's motion. A proposed order is attached to this motion.

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

Dated: August 29, 2018

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of August, 2018, I will cause to be filed electronically the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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